



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Bruce Gates, Treasurer  
The Freedom Project  
111 C Street SE  
Washington, DC 20003

Identification Number: C00305805

JAN 10 2001

Reference: October Monthly Report (9/1/00-9/30/00)

Dear Mr. Gates:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the

donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

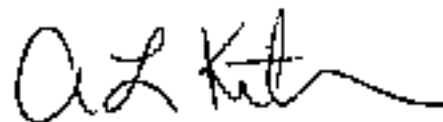
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Schedule B supporting Line 23 of your report discloses a contribution to a federal candidate for "Debt Retirement" (pertinent portion attached). Please provide the election year this contribution should be attributed to.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Antoinette Kitchen  
Reports Analyst  
Reports Analysis Division

SCHEDULE A  
Contributions from Other Political Committees

## ITEMIZED RECEIPTS

Page 2 of 4  
For line number: 11(c)

Any info. copied from Reports or Statements may not be sold or used by any person for purpose of soliciting contrib. or for commercial purpose, other than using name & addr. of a political comm. to solicit from comm.

Full Name of Committee: THE FREEDOM PROJECT C00305805

A. Full Name, Address, Zipcode	Employer/Occupation	Date	Amount
Chicago Board of Trade PAC 141 W. Jackson Blvd. Chicago, IL 60604		09/12/00	\$2500.00

Receipt for: G Aggregate ytd > \$5000.00

B. Full Name, Address, Zipcode	Employer/Occupation	Date	Amount
CSX Corp. PAC 1331 Pennsylvania Avenue, NW Suite 560 Washington, DC 20004		09/25/00	\$2500.00

Receipt for: G Aggregate ytd > \$5000.00

C. Full Name, Address, Zipcode	Employer/Occupation	Date	Amount
Deloitte & Touche Federal PAC P.O. Box 365 Washington, DC 20044		09/25/00	\$2500.00

Receipt for: G Aggregate ytd > \$2500.00

D. Full Name, Address, Zipcode	Employer/Occupation	Date	Amount
Fed. Amer. Health Systems PAC 1111-19th St., NW, Suite 402 Washington, DC 20036		09/17/00	\$1000.00

Receipt for: G Aggregate ytd > \$1000.00

E. Full Name, Address, Zipcode	Employer/Occupation	Date	Amount
Goldman Sachs PAC 1101 Pennsylvania Avenue, NW Suite 900 Washington, DC 20004		09/17/00	\$2000.00

Receipt for: G Aggregate ytd > \$2000.00

F. Full Name, Address, Zipcode	Employer/Occupation	Date	Amount
Health Plan PAC (AAMP) Amer. Assn. of Health Plans 1129 20th Street, NW Washington, DC 20036		09/25/00	\$1500.00

Receipt for: G Aggregate ytd > \$2500.00

SUBTOTAL of Receipts This Page .....	\$12000.00
TOTAL This Period .....	\$24000.00

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Page 2 of 2

## Contributions to Federal Candidates

For line number: 23

Any info. copied from Reports or Statements may not be sold or used by any person for purpose of soliciting contrib. or for commercial purpose, other than using name & addr. of a political comm. to solicit from comm.

Full Name of Committee: THE FREEDOM PROJECT C00305805

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A. Full Name, Address, Zipcode	Purpose of Disbursement	Date	Disburse
Phill Kline for Congress P.O. Box 3009 Shawnee, KS 66203	Contribution (KS-03) DEBT RETIREMENT	09/12/00	\$5000.00

Disburs. for:p

B. Full Name, Address, Zipcode	Purpose of Disbursement	Date	Disburse
Todd Akin for U.S. Congress P.O. Box 31222 St. Louis, MO 63131	Contribution (MO-02)	09/28/00	\$5000.00

Disburs. for:g

SUBTOTAL of Disbursements This Page .....	\$10000.00
TOTAL This Period .....	\$40000.00

